

**Comments to the
Federal Communications Commission
Washington, D.C. 20554**

In the matter of)	
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Schools and Libraries Universal Services)	CC Docket No. 02-6
Support Mechanism)	
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Norris E. Dickard, Senior Associate of the Benton Foundation, submits the following comments on behalf of the Benton Foundation concerning the Notice of Proposed Rule Making and Order.

COMMENTS

In February 2000, the Benton Foundation, collaborating with the Center for Children and Technology (CCT), released *The E-Rate in America: A Tale of Four Cities*. This work was one of the first studies of the impact of the then-new federal program, tracing the ideas and political battles that led to its establishment and recounting the practical issues confronting school districts as they sought to benefit from E-Rate resources. Also included were questionnaires designed to help school officials begin the process of assessing technology use in their schools.

As part of *The E-Rate in America*, four large urban districts (Chicago, Cleveland, Detroit and Milwaukee) were studied in fall 1999. While each of the districts had a unique experience when it came to planning, applying for and using E-Rate discounts, the process afforded a number of common benefits to all of them:

- E-Rate discounts made it possible for the districts to accelerate their network infrastructure development and dramatically expand Internet access.
- The E-Rate freed up resources to pay for other elements of district educational technology programs such as computer and software purchases and teacher professional development.
- The E-Rate application process led to improved district planning practices.

At the same time, E-Rate implementation raised new challenges and taxed districts' resources in the following manner:

- The E-Rate process strained relationships with vendors who provided the telecommunications services to schools.

- It was necessary for administrators and community stakeholders to be made more aware of the impact of the program.
- Much-needed building basics not covered by the E-Rate, such as electrical upgrades and hardware purchases, delayed the deployment of information technology.
- Teacher professional development needs increased dramatically.
- Districts were becoming highly dependent on E-Rate funding to sustain their networks.

In the just completed, second phase of our E-Rate work, the Benton Foundation and the Center for Children and Technology continued our investigation into the E-Rate and developed new tools to assist teachers, administrators and policymakers. Three overarching concerns have emerged in the current policy climate: It is imperative that the E-Rate program is structured in such a way as to maximize impact; it is critical to be able to measure a return on the nation's educational technology investment; and, given current budget constraints at both the federal and state level, sustainability is a significant challenge. The Benton Foundation and CCT compiled our findings and observations into a new report, *Great Expectations, Leveraging America's Investment in Educational Technology*, published in January 2002. The report's preface was written by U.S. Senators Rockefeller and Snowe and Representatives Markey and Upton. Online versions of both Benton E-Rate reports are available at www.benton.org/e-rate/execsummary.html). The E-Rate project was supported with generous funding from the Joyce Foundation.

Our work for the *Great Expectations* study included interviews with key national, state, and local stakeholders in the cities of Chicago and Milwaukee. In May 2001, two national roundtable discussions were held on the E-Rate and educational technology in general with representatives from the school, district, state, federal, corporate, and foundation communities. A pre-publication event held at the National Education Association in late 2001 was attended by 90 policymakers and afforded another chance for the field to review and comment on our findings. The E-Rate recommendations in our report have been informed by these discussions and will form the basis for our general and specific comments on the broad categories and select issues in which the Commission has requested comment.

Application Process Improvement

While praise had been near universal over the resources the E-Rate provided, for many the process of applying and complying can be improved. An Illinois State Department of Education official said at one Benton roundtable, "the E-Rate program has some badly squeaking wheels that need to be oiled." A

Latino Issues Forum Report, released in summer 2001 and called *Connecting California's Children: Is E-Rate Enough*, focused on evaluating the impact of the E-Rate on that state's most disadvantaged schools. Researchers found that many California underserved schools that desperately need E-Rate funds do not feel they can negotiate the laborious and technical process. They simply do not have the time or staff with the grant-writing expertise necessary. The SLD has greatly simplified the process of applying for the E-Rate. The Commission should continue to consider recommendations to make it easier for smaller schools and districts to participate at higher levels.

The *Connecting California's Children* reported that a surprising 43 percent of the disadvantaged schools participating in their study did not even know about the E-Rate. Some larger states (such as California, Florida, Illinois and Pennsylvania) and smaller states (such as Iowa, Mississippi and North Carolina) have committed substantial resources to assisting localities to apply and comply. Schools outside of such states must often go it alone. The Commission should examine ways to improve and expand outreach and assistance to low-income communities, such as creating a fund for regional or state assistance. States should be engaged more broadly as full partners in the program. Finally, we encourage the Commission to require a certification that schools and libraries are in compliance with the requirements of the Americans with Disabilities Act.

Post Commitment Program Administration Improvements

The issue of equipment transferability is the symptom of a greater problem that requires attention. As is well known, as the demand for E-Rate discounts has steadily increased the availability of support for internal connections has significantly decreased. Some schools or districts have attempted to transfer internal connections equipment from an eligible school to an ineligible school, and then apply for new equipment for the eligible school. Too many needy schools and districts have pressing internal connectivity needs that are not being met. This was underscored at Benton Foundation national roundtables as a critical issue. Thus, an important question not addressed in the NPRM is whether the current matrix of discount levels is most appropriate and the priorities reflect the most pressing and strategic needs.

The Commission is to be commended for seeking input on the ramifications of *The Alaska Order*. The Benton Foundation has submitted extensive joint comments with CTCNet and others on this specific issue but would like to summarize some of the most salient points here. The Commission should expand the impact of the E-Rate by allowing other schools and libraries across the country to make excess

capacity available to their communities as well. Many less densely populated rural areas do not have access to low-cost commercial Internet providers. Furthermore, the Commission should permit schools and libraries to fully exercise their own discretion in choosing whether to make excess bandwidth capacity available to their communities as long as they certify that these decisions do not increase costs to the program or impair the use of discounted service toward its principal educational purpose.

Treatment of Unused Funds

We concur with the separate statement of Commissioner Copps that the NPRM has created ambiguity where none exists, related to the issue of whether unspent funds in one year of the program may be provided to schools and libraries in subsequent years. These unused funds must be used to meet the great demand for E-Rate services. Moreover, Benton advocates raising the funding cap from the current level of \$2.25 billion.

As data on the connectivity of the nation's schools indicate, the work of the E-Rate is far from over. Of course, technology is also continually changing and schools will have recurring and new costs. A director of technology for a large urban school system, said at a Benton roundtable, "There is a propensity to declare victory too early in this work." As noted above, the unmet needs are especially acute in the area of internal connections. Some analysts have suggested that if the program priorities were changed, to place a greater emphasis on internal connections for example, such needs could be met. At the Benton policy roundtable in Milwaukee, one participant provided his answer to the policy dilemma: "We have to raise the caps, and we have to prioritize." Increasing the funding cap could also leverage new resources, as E-Rate discounts free up school technology funds for other critical needs such as computer and software purchases, technical support, electrical upgrades and teacher professional development.

Conclusion

To conclude, because of the E-Rate and other federal educational technology investments, multimedia computers, high-speed networks and sophisticated new software programs are becoming commonplace in America's schools and libraries. The E-Rate is a vital resource for connecting disadvantaged schools to 21st-Century digital opportunities. Former critics are now in agreement that the E-Rate is a critical investment, even as they call for "bureaucratic hassles" to be eliminated. It is our hope that these comments and those from others in the field will help improve the program, and ensure that the E-Rate continues to leverage America's investment in educational technology.